

4. The Plaintiffs have been advised of the existence of a defect or defects in the title to the subject property, which subject property comprises a 13.7725 acre parcel of the farm which they own in Frederick County, which farm contains a total of 140.0551 acres. Specifically, in the chain of title to the subject property, the title can be traced back to one Dawson V. Hammon. The Land Records indicate that the said Dawson V. Hammon acquired his title by adversely possessing the subject property for more than the statutory period; however, no deed confirming this was ever granted to the said Dawson V. Hammon, and no Court ever ordered title be vested in the said Dawson V. Hammon by reason of adverse possession. Because of this break in the chain of title, the Plaintiffs have learned that the subject property cannot be insured by a reputable title insurance company, and they are therefore unable to pass good title to this property to their contract purchasers. Therefore, the Plaintiffs have brought this case for the purpose of clearing the title to the 13.7725 acre subject property, which property is located in the middle of the farm upon which they currently live.

5. Plaintiffs are not aware of any person claiming title to this property other than themselves or of any person challenging the Plaintiffs' title to the property. The named Defendant in this matter, John Samuel Williams, is named simply because he is the only person, other than the Plaintiffs, who owns property directly adjacent to the subject property.